

1 IN THE UNITED STATES DISTRICT COURT

2 FOR THE DISTRICT OF MARYLAND

4
5 DIAGNOSTIC RESEARCH

6 GROUP, LLC,

7 Plaintiff

8 v.

9 TOSHIBA AMERICA MEDICAL

10 SYSTEMS, INC.,

11 Defendant

x

x

x

x

x

12, x

© O

U.S. District Court

Civil No. L-02-3020

Court Case No.

03-C-02-006016

14 Deposition of KIMBERLY STEHMAN, VOLUME 2

15 Baltimore, Maryland

16 Thursday, March 20, 2003

17 1:40 P.M.

18
19 Job No.: 1-14113

20 Pages: 105 - 174

21 Reported by: Sharon D. Livingston, CSR-RPR

22

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1 • Did you have any discussion with Mr. Low
2 about what was going to happen to records at
3 Diagnostic Resource Group when it closed?

4 A Nothing that I recall specifically, no,
5 sir.

6 • And where would medical and medical
7 reimbursement and patient records have been kept for
8 Diagnostic Resource Group?

9 A At Diagnostic Resource Group on Bel Air
10 Road.

11 • And what would have happened to those
12 records that are referred to in number 9?

13 A I think I had said before we got locked out
14 of that office because of the landlord. Other than
15 that, I have no idea what would have happened to
16 them.

17 • And what did you do to preserve those
18 records after you state that you had been locked out
19 of the office?

20 A I personally did nothing.

21 • And do you know if Mr. Low did anything?

22 A I'm sorry. I couldn't hear you.

1 • And are they attached to the machine
2 itself?

3 A The coils literally plug into a part of the
4 machine so that they can be connected to run.

5 • You were asked some questions about --

6 A Hold on one second. Hold on.

7 (Interruption in proceedings.)

8 A Okay. Go ahead. I apologize.

9 • You were asked some questions today about
10 Jeffrey Low and Dr. Templeton having conversations.
11 You said they had one or two at the center that you
12 saw; is that correct?

13 A Correct.

14 • Do you know whether or not they had other
15 conversations to which you were not -- at which you
16 were not present?

17 A I would guarantee they probably did.

18 • Okay. But you didn't hear any of them?

19 A No, sir.

20 • Okay. You mentioned that the landlord
21 changed the locks.

22 A Correct.

1 Q Did the landlord let you take out the
2 materials that were inside first?

3 A o sir.

4 Q I'm sorry. Say it louder.

5 A No.

6 Q Do you own any interest in Diagnostic
7 Resource Group, LLC?

8 A No, sir.

9 Q There's a list that's listed as Stehman 8
10 that we talked about.

11 Was it dictated to you, or did you work up
12 the list with somebody else or yourself?

13 A No, I didn't make up the list myself.
14 Based on problems that I had said, Mr. Low said, go
15 ahead, take this stuff up, and let's get it to them.
16 Sam, my other phone **is** ringing. Hold on one second.

17 (Interruption **in** proceedings.)

18 A I'm sorry. Go **ahead**.

19 Now, you mentioned that DRG did not want
20 the generator, and I think it was a little bit
21 confusing.

22 Why was **the** generator put in there?